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January 24, 2026

By ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Fair Housing Justice Center, Inc. et al. v. Juda Niayzov et al.*,
24-cv-04201

Dear Judge Hall:

We represent the Plaintiffs in this case. We write in response to the pre-motion letter that Defendant 202 Marine LLC ("202") submitted earlier today (ECF 51).

Mr. Sekas appears to be confused. He already filed a pre-motion letter in this case on behalf of 202 on September 6, 2024 (ECF 35), to which Plaintiffs responded on September 9, 2024 (ECF 36). A pre-motion conference already has been scheduled for February 19, 2024. Indeed, Mr. Sekas sought and received an adjournment of the previously-scheduled pre-motion conference (1/8/25 Order), which makes his submission of a second substantive letter confusing.

In any event, Mr. Sekas's new letter merely rehashes the meritless arguments he made in his September 6, 2024 letter, and I therefore respectfully refer the Court to my September 9, 2024 response letter.

We look forward to discussing the issues that Mr. Sekas has raised at the February 19, 2024 pre-motion conference.

Respectfully submitted,



Eric Hecker

cc: All Counsel of Record (by ECF)